Board Meeting
February 19-20, 2002
Tuolumne County
Administration Center
2 South Green Street
Sonora. California 95370

BOARD OF EUPEN SORS COUNT OF THE THE ORS Agenda Item
Attachment 1
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November 29, 2001

Ms. Carolyn Sullivan, Office of Local Assistance California Integrated Waste Management Board Cal-EPA Building PO Box 4025 1001 "I" Street Sacramento, CA 95812-4025

Dear Ms. Sullivan:

Attached is a copy of Tuolumne County's five year CIWMP review report. One of the issues not raised in the report is my District's concern about the close of the Groveland landfill. This landfill can be considered a "trickling" landfill. It provided service to the isolated regions of southern Tuolumne County and northern Mariposa County.

With the closure of this landfill, volume increases to the multi-recovery facility (MRF) in Sonora will occur. From the enclosed report you will note that the overall increases at the MRF are causing the County to drop towards the 50% diversion rate. Furthermore, the MRF is located in an industrial/residential area that restricts open-ended expansion of this facility.

Another concern is the emissions from diesel trucks that are hauling solid waste from southern Tuolumne County to the MRF in Sonora. This would be eliminated with a continued operation of an integrated mini-MRF-landfill operation at the existing Groveland site.

In closing, I wish to express my desire for the State to review current policy regarding the consolidation of all solid waste disposal. A combination of larger regional facilities with appropriately placed, rural trickling landfills appears to make sense given the size and topography of California. We should keep in mind all factors of solid waste disposal impact, including the impacts associated with long distance transportation, and high costs of disposal. Small, rural landfills would lower these impacts and, most likely, contribute to greater compliance by the public in the disposal of household trash.

Thank you for considering my comments.

Mark V. Thornton

District 4 Supervisor

FIVE YEAR CIWMP REVIEW REPORT

for

TUOLUMNE COUNTY

prepared by the

TUOLUMNE COUNTY DIVISION OF SOLID WASTE

October 25, 2001

Information and any questions or comments about this document should be directed to:

Mark Rappaport, Senior Solid Waste Technician
Department of Public Works
Division of Solid Waste
County of Tuolumne
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Sonora, California 95370
(209) 533-5588

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October 25, 2001

Ms. Carolyn Sullivan
Office of Local Assistance
California Integrated Waste Management Board (CIWMB)
Cal-EPA Building
1001 "I" Street
P. O. Box 4025
Sacramento, California 95812-4025

RE: Tuolumne County Five Year Countywide Integrated Waste Management Plan Review

Dear Ms. Sullivan:

On behalf of the City of Sonora and the County of Tuolumne, please find attached a copy of the Five Year CIWMP Review Report. In conformance with Section 41822 of the Public Resources Code (PRC), the County and City have reviewed the Countywide Integrated Waste Management Plan (CIWMP).

The County's Solid Waste Local Task Force (LTF), submitted written comments to the County within the time frame specified in Section 18788 of Title 14 of the California Code of Regulations (CCR) and they have been incorporated into the report.

The County finds that a CIWMP revision is not necessary at this time. Guided by the current CIWMP, the County and the City of Sonora will continue to implement programs and strive to fulfill the goals of the Integrated Waste Management Act.

Please contact Mark Rappaport at (209) 533-5588 you have any questions or comments.

Respectfully submitted,

Peter Rei, Director

Public Works Director

Tuolumne County Department of Public Works

Division of Solid Waste

cc Local Task Force Members
Greg Applegate, City of Sonora

CHAPTER 1.0 INTRODUCTION

The California Integrated Waste Management Act of 1989 (Assembly Bill 939) requires city and counties in California to reduce the amount of solid waste disposed in landfills and transformed by 25% by 1995; by 50% by the year 2000 through source reduction, recycling, and composting activities. Transformation may be used to reduce the wastes sent to landfills by no more than 10% in the year 2000. The CIWMP is the guiding document for attaining these goals.

PRC Section 41822 requires each city and county to review its source reduction and recycling element (SRRE) or the CIWMP at least once every five years to:

- (1) correct any deficiencies in the element or plan;
- (2) comply with the source reduction and recycling requirements established under PRC Section 41780; and
- (3) revise the documents, as necessary.

The CIWMB clarified the five year CIWMP review process in CCR Section 18788. Section 18788 states that prior to the fifth anniversary of CIWMB Board approval of the CIWMP, the LTF shall complete a review of the CIWMP to assure that the County's waste management practices remain consistent with the hierarchy of waste management practices defined in PRC Section 40051.

The hierarchy stated in PRC 40051 is:

- (1) source reduction;
- (2) recycling and composting;
- (3) environmentally safe transformation and environmentally safe land disposal.

The process identified in CCR 18788 is summarized as follows:

- prior to the 5th anniversary, the LTF shall submit *written comments* on areas of the CIWMP which require revision to the county and the CIWMB;
- within 45 days of receipt of comments, the county shall determine if a revision is necessary and notify the LTF and the CIWMB of its findings in a CIWMP Review Report; and
- within 90 days of receipt of the *CIWMP Review Report*, the CIWMB shall review the county's findings and, at a public hearing, approve or disapprove the county's findings.

CCR 18788 also identifies the minimum issues which are to be addressed in the CIWMP Review Report. They are:

- (A) changes in demographics in the county;
- (B) changes in quantities of the waste within the county;

- (C) Changes in funding sources for administration of the countywide siting element and summary plan;
- (D) changes in administrative responsibilities;
- (E) program implementation status;
- (F) changes in permitted disposal capacity and quantities of waste disposed of in the county;
- (G) changes in available markets for recyclable materials; and
- (H) changes in the implementation schedule.

Countywide Siting Element (CSE)

Summary Plan (SP)

On October 30, 1998 and again on July 21, 2000, the CIWMB Office of Local Assistance sent letters to jurisdictions clarifying the CIWMB's oversight of the five year revision process.

The July 21st letter essentially noted that the five year anniversary is from the date of approval by the CIWMB of the CIWMP; that the CIWMB Legal staff determined that jurisdictions can utilize their annual reports to update program information, if a revision is not determined by the jurisdiction to be necessary; and that if a revision is determined to be necessary, it may be submitted with the next annual report.

CHAPTER 2.0 BACKGROUND

The Multi-Jurisdictional Source Reduction and Recycling Element (SRRE) and the Household Hazardous Waste Element (HHWE) for Tuolumne County and the City of Sonora were prepared and include:

<u>.</u>	SRRE for the City of Sonora and Unincorporated Area of the County HHWE for the City of Sonora and Unincorporated Area
These	elements plus the following documents comprise the CIWMP:
	Nondisposal Facility Element (NDFE) for the County of Tuolumne

Both the SRRE and NDFE were approved by the CIWMB on October 26, 1994. The CSE, SP, and CIWMP were approved by the CIWMB on November 20, 1996. Thus, the anniversary date for the first five year CIWMP review is November 20, 2001.

The County and city's diversion goal is 50% for the mid-term compliance goal year (2000). No petition for a reduction in the 50% year 2000 goal has been requested.

CHAPTER 3.0 PURPOSE

The purpose of this *CIWMP Review Report* is twofold: (1) to document the compliance of Tuolumne County and the city of Sonora with PRC 41822 and CCR 18788; and (2) to solicit a wider

review, recommendations, and support for the course of action identified by the jurisdictions in Tuolumne County to achieve increased levels of diversion.

CHAPTER 4.0 LOCAL TASK FORCE REVIEW

The Tuolumne County Solid Waste Local Task Force (LTF) meets generally every month. At the LTF July 12, 2001 meeting, the five year CIWMP review was agendized and discussed. The Task Force directed Solid Waste Division (Division) staff to review the planning documents and report back to the Task Force at its next meeting. At the August 9, 2001 meeting of the LTF, Division staff presented the content and adequacy of each of the planning documents, observations on the current applicability of the CIWMP, and recommendations.

At the September 13th meeting, the LTF authorized the preparation of a letter to the county transmitting its written comments after extensive discussion. The LTF determined that revision of the CIWMP was not necessary.

CHAPTER 5.0 SECTION 18788 (3) (A) THROUGH (H) ISSUES

OVERVIEW

Division staff and the LTF reviewed each CIWMP document and found that the documents, accompanied by the annual reports, continue to serve as appropriate reference tools for implementing and monitoring compliance with AB 939. The Summary Plan adequately summarizes the solid waste and household hazardous waste management infrastructure within the county.

The goals, objectives, and policies in the elements are still applicable and consistent with PRC 40051 and 40052.

The selected programs for each component were reviewed. Nearly all programs were being implemented. The annual reports and the Planning Annual Report Information System (PARIS) for the County and each city are up to date. Although there have been some changes in program implementation, schedules, costs, and results, these changes are not considered to be significant. Furthermore, it is felt that continued emphasis on program development, evaluation, and implementation are more important than refining the CIWMP through a revision.

The LTF did request that a construction and demolition debris (C&D) program component be added in the next (2001) annual report.

The diversion performance for the county and city are identified in Table 5-1.

Table 5-1. Diversion Rate Trends (1995-1999) *

Year	Sonora	Unincorporated County
1995	69%	55%
1996	54%	56%
1997	45%	58%
1998	54%	52%
1999	63%	51%

* Source: CIWMB Website - Diversion Measurement.

The LTF suggested the County consider, within the next five years, conducting a diversion study to better quantify diversion attainment by program and sector (residential, commercial, government).

Based on preliminary data, the County may drop below the 50% diversion mandate for the year 2000 reporting period. Based on this the County is considering the possibility of requesting a time extension under SB 1066 and will reserve the right to do so in its 2000 annual report.

DEMOGRAPHICS

Table 5-2 depicts demographic changes from 1990 to 1999. The County has experienced significant growth which has resulted in increased waste generation.

QUANTITIES OF WASTE

Table 5-3 provides the calculated per capita (pounds per person per day) of residential and total waste generation within each jurisdiction. The statewide average per capita in 1990 for total waste generation was approximately 8 ppd whereas for residential waste per capita, about 3 ppd.

Whereas the per capita total waste generation within the City of Sonora is notably higher than the statewide average, the county is less than the statewide average.

The City of Sonora's higher per capita is likely explained by the fact that the area is a tourist destination and has a higher equivalent year-round population than characterized by the actual year-round permanent population and the City contains most of the commercial trade.

Table 5-2. Demographic Changes *

Demographic Factor	1990	1999	% Change
Sonora Population	4,153	4,220	1.6%
Unincorporated Population	48,456	52,800	10%
Countywide Population	52,609	57,020	8.4%
Countywide Employment	19,490	18,580	(4.7%)
Sonora Taxable Sales Transactions	\$89,039	\$175,956	97.6%
Unincorporated Taxable Sales Transactions	\$342,153	\$457,824	33.8%
Countywide Taxable Sales Transactions	\$431,192	\$633,780	47%
Statewide Consumer Price Index (CPI)	135.0	168.5	25%

Source: CIWMB Website - Default Adjustment Factors.

Table 5-3. 1990 Base Year Per Capita Calculations *

Parameter (1990 Values)	Sonora	Unincorporated County	Countywide
Population	4,153	48,456	52,609
Total Waste Generation (tons)	7,472	55,547	63,019
Per Capita (pounds per person per day)	9.85	6.28	8.07
Residential Waste Generation	1,874	15,862	17,736
Per Capita (ppd)	2.21	1.96	3.7

Source: CIWMB Website and CIWMB-approved SRRE's.

The reported disposal tonnage (according to the CIWMB QDRS) is compiled in Table 5-4 for each jurisdiction for the period 1995 through 1999. The tonnage has increased and likely represents the significant growth occurring in the City and County from housing construction and the expansion of the commercial sector.

Solid waste disposal and waste generation quantities were projected for the fifteen year period (1990-2005) in the SRRE. The projections for 1999 were compared with the reported disposal tonnage by the QDRS and the calculated waste generation resulting from the adjustment methodology formula. The results of the comparison are depicted in Tables 5-5 and 5-6. The large discrepancy causes the County to question the accuracy of the Adjustment Method in relation to smaller rural jurisdictions. The County will monitor the CIWMBs ongoing review of the adjustment method and DRS.

Table 5-4. Disposal Tonnage Trends (1995-1999) *

Year	Sonora	Unincorporated County	Countywide
1995	3,360.84	24,206.46	27,567.30
1996	3,954.96	23,436.16	27,391.12
1997	5,055.61	23,154.38	28,209.99
1998	4,302.67	26,680.78	30,983.45
1999	3,913.21	31,431.54	35,344.75

Source: CIWMB Website - Quarterly Disposal Reporting System (QDRS).

Table 5-5. Comparison of SRRE 1999 Projected Disposal Tonnage vs. 1999 Reported Disposal Tonnage (QDRS)

SRRE Projected **QDRS** Reported Jurisdiction % Difference 4,317 3,913 Sonora (9.4)%23,504 31,432 Unincorporated County 33.7% 27,821 35,345 Countywide 27.04%

Table 5-6. Comparison of SRRE 1999 Projected Waste Generation Tonnage vs. 1999
Calculated Estimated Waste Generation Tonnage (Adjustment Methodology)

Jurisdiction	SRRE Projected	Adjustment Methodology	% Difference
Sonora	10,323	. 9,830	(4.8)%
Unincorporated County	68,745	58,311	(15.2)%
Countywide	79,068	68,141	(13.8)%

As a result of this analysis, it is not recommended that the solid waste generation analysis presented in the SRRE's be revised but that the County monitor diversion and determine the need for a future diversion study.

FUNDING SOURCES

No changes have occurred in the basic funding sources for the administration of the CSE and the Summary Plan. County surcharges on tipping fees, grant funds, and recycling revenues are still the source of funds for CIWMP program development, implementation, and monitoring.

ADMINISTRATIVE RESPONSIBILITIES

No changes have occurred in the administration of the CIWMP.

The Tuolumne County Solid Waste Division is the chief County administrative unit responsible for AB 939 and waste management programs and its personnel continue to be the primary responsible officials.

PROGRAM IMPLEMENTATION

The annual reports have provided updated information concerning program implementation. Nearly all selected programs have been implemented. There are no notable changes from the current CIWMP. However, as mentioned earlier, we are seeing the unincorporated county's diversion rate slip below 50% in 2000-2001. To address this the County has taken steps to increase diversion as follows:

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	Roadside (curbside) Blue Bag Recycling has been expanded and is now available in all four vaste collection areas encompassing all of the County and City of Sonora. Blue bags are being ed free of charge (residents before had to purchase them) to all residents of the county.
market	Our Franchised Disposal contractor is in the process of establishing a facility to accept inert als and wood waste for recycling. In addition, they are building a second hand store for the ting of useable materials pulled from the main disposal site (materials recovery facility) and hold hazardous waste collections (HHW reuse and reprocessed latex paint).
	Tires are no longer being disposed in the Lockwood landfill but instead being recycled.
	A permanent household hazardous waste collection facility (PHHWCF) will be constructed \$200,000 CIWMB grant. This facility will increase annual HHW collections from 12 to timately 18 (50%).

Significant changes which have occurred regarding the implementation of diversion programs involve "program expansion", notably the blue bag program and operations at the MRF. The County continues to build upon prior years' experience and the increasing support of the general public to increase diversion quantities. The primary diversion programs have been built around the MRF. This facility is improving diversion rates and effectiveness. The MRF is continually reviewing and modifying as necessary operations to maximize diversion and cost efficiency.

PERMITTED DISPOSAL CAPACITY

The Lockwood Landfill in Reno, Nevada continues to receive all of the County's municipal solid waste and has well in excess of 15 years capacity. Our Franchise Disposer continues to research other disposal facilities to obtain the most cost effective options.

AVAILABLE MARKETS

Markets for recovered recyclable materials have been available. Though the market material quantity supply and demand and resulting market prices often fluctuate, outlets continue to be available.

IMPLEMENTATION SCHEDULE

Changes in the implementation schedule have occurred but have not significantly affected the ability of the County and City to realize planned diversion levels in Y2K.

OTHER ISSUES

The LTF in its review of the CIWMB identified the importance of C&D recycling and directed that a C&D program be planned in the long term. The County is already working with its Franchised Disposal contractor to establish an inert material facility that could incorporate C&D waste. The LTF has also expressed a desire for the County to look into food waste composting and waste to energy solutions.

CHAPTER 6.0 SUMMARY STATEMENT

The overall framework of the CIWMP is still applicable.

The goals, objectives, policies, waste management infrastructure, funding sources, and responsible administrative organizational units noted throughout the CIWMP still are accurately described.

Nearly all of the selected and contingent programs have been and are continuing to be implemented.

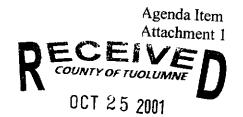
Although a few programs have been revised, overall program implementation has been discussed in the annual reports and the PARIS has been kept updated.

The County and City continue to monitor evolving compliance issues. To better understand the effectiveness of programs, the County continually communicates with other rural jurisdictions through participation in the Rural Counties Environmental Services Joint Powers Authority. A future countywide waste diversion study is being considered.

Consequently, the County feels that the most effective allocation of available resources at this time is to continue to utilize the existing CIWMP as a planning tool augmented by the annual reports.

For these reasons, the County does not feel that revision of its CIWMP is warranted or desirable at this time.

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To: Mark Rappaport

Fr: Alexis Halstead, LTF member AH

Dt: October 22, 2001

Re: Comments on IWMP for 5-year review

DEPARTMENT OF PUBLIC WORKS

It is my opinion that the existing IWMP still addresses the solid waste diversion issues of Sonora and Tuolumne County. There is no need to rewrite or update it; the challenges for the city and county are not beyond the scope of the plan.

Below, I respectfully submit my concerns and recommendations for future waste stream management.

Waste stream issues:

- Continued compliance with 50% diversion requirement is tenuous
- Unincorporated area population increase and resulting construction waste
- Large housing development in planning stages, more to come
- Increase in taxable sales resulting in increase in commercial waste
- Illegal dumping of waste including hazardous chemicals and larger items like white goods and vehicles is a growing problem
- Increased number of residents in densely populated areas will generate yard waste where burning is not an option
- Future air quality regulations may restrict burning of yard waste

Funding issues:

- Long range funding listed as an objective but no source presently identified. Funding source that will grow with the community is needed.
- Tuolumne County's IWMP depends largely upon the uncertainty of grant funding for its programs
- Some programs put on hold for lack of funding
- Education programs and other efforts must be funded to reach school children and new residents to ensure continued source reduction, recycling and responsible disposal

Suggestions:

• Take creative approach to promotion of educational programs for schools, businesses, families, e.g.: holding contests to elicit ideas from the community that will promote the concept of reuse, reduce and

- Promote the image of Tuolumne County as an environmentally conscientious community.
- Promote composting and vermiculture as on-going projects in schools
- Make projections of future population levels in the county and develop strategies to fund and implement programs to manage the resulting waste stream.
- Focus on areas of change/concern construction, new residents, abandoned vehicles, illegal dumping.
- Ensure that new housing and commercial development projects pay their way towards management of their contribution to the waste stream.